



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

PSS:LHE  
F. #2014R00151

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 9, 2014

**By ECF and First-Class Mail**

Anthony M. LaPinta, Esq.  
Reynolds, Caronia, Gianelli,  
Hagney, LaPinta & Hargraves  
35 Arkay Drive  
Hauppauge, NY 11788

Re: *United States v. Joseph Valerio*  
Criminal Docket No. 14-094 (JFB)

Dear Mr. LaPinta:

The undersigned is firewall counsel in the above-referenced case. Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby produces discovery with respect to this case. This letter supplements the government's discovery letters dated March 17, 2014, March 24, 2014, April 2, 2014, April 8, 2014 and April 14, 2014.

Enclosed please find two CDs, which collectively contain documents Bates numbered BOP000001-BOP000687, and represent the defendant's emails from the period between March 12, 2014 and April 7, 2014, sent and received while the defendant was incarcerated at the Metropolitan Detention Center.

Before reviewing any of these potentially privileged materials, the government instituted firewall procedures. Pursuant to the firewall procedures, the investigators and prosecutors involved in the investigation and prosecution of the above-referenced case ("the investigative team") have not reviewed or been made aware of the substance of any communications between the defendant and his counsel.

The undersigned firewall counsel has reviewed and segregated the materials as follows: Materials contained on the CD labeled "Clean," which contains documents Bates numbered BOP000038-BOP000687, were provided to the investigative team on April 10, 2014. Materials contained on the CD labeled "Privileged," which contains documents Bates numbered BOP000001-BOP000037, have not been disclosed to the investigative team.

Anthony M. LaPinta, Esq.

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Should you have any questions regarding the enclosed materials, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/ Lauren Howard Elbert  
Lauren Howard Elbert  
Assistant U.S. Attorney  
(718) 254-7577

Enclosures

cc: By ECF (without enclosures)  
Clerk of Court (JFB)